

2

Export Certification
Manual

Overview of Export Program

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Introduction

Although foreign countries have established plant quarantine regulations which U.S. exporters of plant and plant products are required to meet, the United States **does not require** phytosanitary certification of those commodities.

The United States Department of Agriculture, Animal and Plant Health Inspection Service, Plant Protection and Quarantine (USDA-APHIS-PPQ) does not regulate the exportation of plants and plant products.

If requested by U.S. exporters, however, the USDA-APHIS-PPQ will provide this service for commodities that are eligible for certification. USDA-APHIS-PPQ will assist U.S. exporters with plants and plant products that are eligible for certification, to meet the plant quarantine import requirements of foreign countries.

The information presented in this section covers topics that Authorized Certification Officials (ACOs) are required to know before working through the procedures to inspect and certify plants and plant products offered for export certification. Topics include roles and responsibilities of each party involved in the certification process, the established contact protocol when assistance is needed, and a general overview of APHIS' policy and special procedures of the Export Program.

Overview of Export Program Policies and Procedures

The US Export Program is based on standards established by the International Plant Protection Convention (IPPC) and the North American Plant Protection Organization (NAPPO). The U.S. Export

Program has an obligation and responsibility to meet the standards developed by the IPPC and NAPPO. The two primary standards, on which the U.S. Export Program is based are the following:

- ◆ IPPC: International Standard for Phytosanitary Measures (ISPM) No. 7 Export Certification System
- ◆ NAPPO: RSPM No. 8 The Accreditation of Individuals to Sign Federal Phytosanitary Certificates

USDA-APHIS-PPQ is delegated as the National Plant Protection Organization (NPPO) and assumes the responsibilities for ensuring the U.S. Export Program meets international standards. To facilitate the export of plants and plant products for our stakeholders and have a credible export program that is respected by our trading partners, our program will follow the policies and procedures in this manual. Our policies and procedures are designed to be consistent with IPPC and NAPPO standards.

The policies and procedures of the U.S. Export Program covered in this section are as follows:

- ◆ Who is eligible to issue certificates (see ***Roles and Responsibilities*** on page 2-1-4)
- ◆ Contact Protocol (see ***Contact Protocol*** on page 2-1-12)
- ◆ Types of products for which a certificate is available (see ***Types of Products and Associated Certificates*** on page 2-1-14)
- ◆ Types of certificates (see ***Types of Certificates*** on page 2-1-15)
- ◆ Official Samples and Inspections (see ***Official Samples and Inspections*** on page 2-1-16)
- ◆ Official Verifications and Additional Declarations (see ***Official Verification and Additional Declaration*** on page 2-1-17)
- ◆ Time Limits (see ***Time Limits*** on page 2-1-21)
- ◆ Treatments (see ***Treatments*** on page 2-1-25)

- ◆ **Steps to Certifying a Commodity:**
 - ❖ The eligibility of a commodity for certification is based on the degree to which it has been processed, its origin and destination, and whether it is a plant or plant product that is protected by CITES or ESA (see **Determine if Commodity is Eligible for Certification** on page 2-1-25)
 - ❖ Determining a country's import requirements (see **Identify Import Requirements** on page 2-1-26)
 - ❖ Inspectional guidelines (see **Follow Inspection Guidelines** on page 2-1-26)
 - ❖ How to issue a certificate (see **Prepare Export Certificates** on page 2-1-26)
 - ❖ Collecting user fees (see **Collect User Fee** on page 2-1-26)
- ◆ Special programs (see **Overview of Special Procedures** on page 2-1-27)

Roles and Responsibilities

The primary roles related to export certification are listed below followed by the responsibilities outlined for each role:

- ◆ United States Department of Agriculture, Animal and Plant Health Inspection Service, Plant Protection and Quarantine, Export Services (**USDA-APHIS-PPQ-ES**)
- ◆ Center for Environmental and Regulatory Information Systems (**CERIS**) of Purdue University
- ◆ **Authorized Certification Official** (ACO)
- ◆ **Export Certification Specialist** (ECS)
- ◆ **Exporter or Shipper**

USDA-APHIS-PPQ-ES

As a participant in the Export Program, Export Services (USDA-APHIS-PPQ-ES) is responsible for the following:

1. Establish export certification policy
2. Maintain current information on the plant quarantine import requirements of foreign countries
3. Analyze the information, prepare and write up export summaries of the foreign import requirements for use by Federal, State, and county ACOs and other interested parties
4. Monitor the issuance of certificates to ensure accuracy and that program policies and procedures are adhered to

5. Monitor the Export Program, other than the issuance of certificates, to ensure credibility of the Export Program
6. Assist ACOs in certifying commodities of foreign origin which have been legally imported into the United States and are being re-exported
7. When possible, assist U.S. exporters if their certified shipments are held at destination
8. Provide advice to U.S. exporters with shipments on hold that were exported without meeting the importing country's phytosanitary requirements
9. Ensure that **only** authorized inspectors and ACOs inspect and certify the phytosanitary conditions of commodities offered for export

CERIS

Purdue University's Center for Environmental and Regulatory Information Systems (CERIS) and APHIS maintain the Export Certification Project (EXCERPT) through a cooperative agreement. EXCERPT is a database that contains summaries of the phytosanitary import requirements of foreign countries for plants and plant products. This information can be retrieved by PPQ employees, State and county cooperators, and other authorized users.

Export Services, USDA-APHIS-PPQ, is responsible for analyzing foreign countries' import requirements and putting the information into EXCERPT.

ACOs use the EXCERPT database to determine whether a country regulates a specific commodity and what requirements that commodity must meet.

Under APHIS' cooperative agreement with CERIS, CERIS supports EXCERPT in the following areas:

1. Computer services (hardware and software)
2. Database management systems administration
3. Development and operations
4. Operation of the EXCERPT hotline to assist with technical issues

For further technical information about EXCERPT, contact the EXCERPT program manager at the following address:

EXCERPT Program Manager
USDA-APHIS-PPQ-Export Services
4700 River Road, Unit 140
Riverdale, Maryland 20737
FAX: 301-734-7639
Phone: 301-734-8537

Refer to **EXCERPT** on **page 3-2-1** for a detailed discussion on the EXCERPT database and how to use it.

Authorized Certification Official

Authorized Certification Officials (ACOs) are Plant Protection and Quarantine (PPQ) officers, state and county officials who have been accredited to perform phytosanitary inspections and sign certificates.

The responsibilities of ACOs include the following:

1. Meet the education, experience, and training requirements to become an ACO (see also *Special Procedures, Accreditation Programs, **Accreditation of Authorized Certification Officials** on page 6-2-1*). For State cooperators, the education and experience requirements are described in *Special Procedures, **Federal-State Cooperative Program** on page 6-5-1*.
2. Identify the import requirements of a foreign country for a commodity and determine whether the commodity meets the requirements. This involves reviewing export summaries and may include examining official communication from the National Plant Protection Organization (NPPO).
3. Inspect commodities before issuing the Federal phytosanitary certificate, PPQ 577, to determine that the commodity meets the import requirements.
4. Verify that a re-export commodity has been safeguarded and/or inspected before issuing a Federal phytosanitary certificate, PPQ 579, to determine that the commodity meets the import requirements.
5. Verify the processing of a commodity and/or inspect the commodity before issuing a Federal export certificate, PPQ 578, to determine that the commodity meets the import requirements.
6. Issue export certificates **only** for those commodities that are currently eligible for certification under APHIS-PPQ policy (see ***Eligibility Based on What the Product Is** on page 4-2-2*).
7. Refuse to issue export certificates for commodities that are prohibited or do not meet a country's import requirements.
8. Advise exporters when their commodity is **not** eligible for certification.

9. Advise exporters to export their commodity within a country's specified time limits or APHIS's policy. Refer to the DEFINITIONS OF TERMS AND CODED ABBREVIATIONS in an export summary for a country's time limits.
10. Monitor or verify the application of any treatment to prepare the commodity for export. (For details of USDA-APHIS-PPQ policy regarding monitoring treatments, see **7. Does the Commodity Require Treatment or Was a Treatment Conducted?** on page 4-4-11.
11. Verify that the contents of the shipment are what is documented on the PPQ Form 572 Application for Inspection and Certification of Domestic Plants and Plant Products for Export. Compare the application with any supporting documents (such as inspection certificates, State certificates, or other agency reports) that may help to verify the accuracy of the contents of the shipment.
12. Advise exporters, shippers, or brokers as to the status of a shipment. When samples are drawn for laboratory examination or when there will be delays in certifying the shipment let the exporter or the shipping company know so that the shipment is **not** inadvertently loaded before inspecting and certifying. Once the inspection is completed and the certificate is issued immediately notify the exporter or the shipping company.
13. Prepare certificates in English. They can be handwritten or typed unless specified otherwise in an export summary. Handwritten certificates must be legible. Some foreign countries will **not** accept certificates with alterations, errors, or erasures. See **General Guidelines for Completing Certificates** on page 5-1-6.
14. Forward the record copy of each certificate to your Export Certification Specialist. Attach copies of import permits and other supporting documents (including translated documents with the original foreign language document) used for certifying each shipment. Who and when to send copies will be established by the ECS and State Plant Health Director (SPHD). A rule-of-thumb is to gather and send forward copies of issued certificates weekly.
15. For PPQ officers, inspect and certify commodities during normal duty hours and at locations normally traveled to in connection with other work assignments. PPQ managers should use discretion when assigning ACOs to phytosanitary export inspections that involve a significant amount of travel time. When requests for services at remote locations occur, all alternative methods of certification should be explored before PPQ work hours are committed.

- 16.** Maintain accreditation by actively issuing¹ certificates, attending refresher training and successfully passing a renewal test at a minimum of every 3 years. See also *Special Procedures, Accreditation Programs, [Accreditation of Authorized Certification Officials](#)* on page 6-2-1.

Export Certification Specialist

Export Certification Specialists (ECSs) play a vital role in ensuring the continuity, credibility, and integrity of PPQ's phytosanitary Export Program by providing training and quality control functions. Their role includes the following responsibilities:

- 1.** Serve as the point of contact and expert on phytosanitary issues for all ACOs under their assigned area.
- 2.** Serve as technical liaison among local, State, regional, and national officials regarding export certification assistance. Be knowledgeable in agricultural production and commodity management practices within assigned areas in order to provide recommendations that enhance export protocols.
- 3.** Review (at least monthly) 5 to 10 percent of all certificates issued by ACOs within their assigned area for compliance with established policy and foreign import requirements. See [Review Guidelines for Certificates](#) on page 6-12-1 for documenting major mistakes, providing feedback, and determining when to provide retraining and when to recommend revocation of an ACO's accreditation.
- 4.** Investigate the issuance of certificates for shipments that have been detained or rejected by the importing country. This should include verifying documents, adherence to certification policy and procedures, and conformance with the importing countries' plant import requirements.
- 5.** Inform Export Services² of the following situations:
 - A.** Import requirements as stated in official communication from the National Plant Protection Organization (NPPO) differ from export summary requirements.
 - B.** Issuance of a certificate which may cause embarrassment or financial liability to the USDA or its employees, financial loss to the shipper or industry, or damage the credibility of the phytosanitary Export Program (as part of the review guidelines).

¹ ACOs can be placed in an inactive status if they fail to issue Federal plant export certificates within one year of initial accreditation or fail to issue Federal plant export certificates within a 2 year period of time.
² Export Services, USDA-APHIS-PPQ, 4700 River Road, Unit 140, Riverdale, Maryland 20737; Phone 301-734-8537; FAX 301-734-7639.

6. Determine the need for, coordinate, and conduct initial training for State and county personnel within assigned areas. Develop and present refresher training for all ACOs within assigned areas following the *Administrative Guide for Export Certification Training*. This training helps to maintain ACO accreditation, meet the requirements of the International Plant Protection Convention (IPPC) and the North American Plant Protection Organization (NAPPO) standards, maintain credibility of the export certificate program, and avoid recurrent errors in issuing certificates.
7. Ensure that an effective accountability system is established and maintained by State Plant Health Directors and State Plant Regulatory Officials for the certificates issued under assigned areas.
8. Participate in periodic workshops conducted by Export Services.
9. Develop and maintain a broad knowledge base of all exported commodities. Participation in developmental assignments with Export Services and the regional offices is encouraged.
10. Screen and forward a list of State cooperator nominees, along with their qualifications, to Export Services for granting accreditation to issue certificates in conformance with Federal regulations. (See *Special Procedures*, **Federal-State Cooperative Program** on page 6-5-1.)
11. Maintain accreditation records for all ACOs in the nationwide ACO database. Notify Export Services of cooperators who transfer, retire, or otherwise separate from State or county employment.
12. Be guided by the Memorandum(s) of Understanding (MOU) for the Federal-State Cooperative Program, and review the MOU as circumstances warrant (e.g., change in personnel). Notify Export Services of needed changes. If a signed copy of a State's MOU is needed contact the USDA-APHIS-PPQ regional office.
13. Keep a current copy of the *Export Certification Manual* and associated materials such as Phytosanitary Notes. Notify USDA-APHIS-PPQ's Manuals Unit of needed changes and updates. (See *Introduction*, **How to Report Problems With the ECM** on page 1-1-8.)
14. Be proficient using EXCERPT and other databases, such as the ACO national database and Germplasm Resources Information Network (GRIN) database. Notify Export Services of needed changes and updates to the information in EXCERPT. Maintain the emergency response plans for EXCERPT.

- 15.** Conduct field audits involving review of facilities, issued certificates, and ACO records to ensure compliance with Federal regulations, policies and procedures, and USDA-APHIS-PPQ's obligations to bilateral agreements and protocols, Memorandums of Understanding, and international standards. Identify and document mistakes. See [Review Guidelines for Certificates](#) on **page 6-12-1** for documenting major mistakes, giving feedback, and determining when to recommend suspension.
- 16.** Assist Export Services in their periodic audit of issued certificates. Assist national and regional export program officials to identify and develop required training guidelines and course work.
- 17.** Assist APHIS headquarters with Freedom of Information Act (FOIA) requests. Assist State and national Investigative and Enforcement Services staff (USDA-APHIS-IES) and PPQ State and headquarters offices to research and obtain information related to cases involving the issuance of certificates.
- 18.** Assist regional and national offices to review newly-developed export protocols and work plans for establishing export continuity in the phytosanitary Export Program. Provide input to regional and national Export Program officials when developing new certification policies and procedures or modifying existing ones.

Exporter or Shipper

The responsibilities of the exporter or shipper³ include the following:

- 1.** Apply, in writing, for the inspection, sampling, testing, and certification of commodities offered for export. Certificates can be issued at the point of origin, at a port where the shipment will transit, or at the actual port of export. PPQ Form 572, Application for Inspection and Certification of Domestic Plants and Plant Products for Export, can be requested from the nearest ACO office or downloaded from the following web site address:

[<http://www.aphis.usda.gov/ppq/pim/exports/certificates&forms.html>](http://www.aphis.usda.gov/ppq/pim/exports/certificates&forms.html)
- 2.** Contact an Accredited Certification Official (ACO) far enough in advance of the shipping or loading dates to allow the ACO to determine the phytosanitary import requirements and conduct required sampling, inspecting, testing, etc. in advance of the shipping or loading dates and specified time limits.

³ The exporter responsibilities are also available as a separate document printed at the end of the ECM or on-line at the following web site address: [<http://www.aphis.usda.gov/ppq/manuals/pdf_files/Exporter_Responsibilities.pdf>](http://www.aphis.usda.gov/ppq/manuals/pdf_files/Exporter_Responsibilities.pdf) for the purpose of providing exporters with a list of responsibilities for their information and knowledge.

Exporters **must** be aware of and plan for any time limit restrictions a foreign country may specify for the period between date of inspection or date of certificate issuance and shipping date. If a time limit is **not** specified by a country the policy on time limits for inspections is **not** more than 30 days before export.

3. Provide all necessary documentation, including, import permits, bills of lading, manifests, shipping invoices, foreign phytosanitary certificates, and inspection certificates. It is the exporter's responsibility to provide official documents stating import requirements if they differ from those that USDA-APHIS-PPQ has. Official documents may be an import permit, special authorization, or recent correspondence from the National Plant Protection Organization (NPPO) of the foreign country.

Exporters are responsible for ensuring official documents are translated into English; USDA-APHIS-PPQ does not provide translation services. Bilingual information is acceptable as long as one of the languages is English.



Exporters frequently present letters of credit from their contacts in the foreign country to indicate that plant quarantine regulations have been changed. Letters of credit are strictly fiduciary documents. For the purposes of phytosanitary certification, letters of credit **cannot** be considered official notifications of changes or exceptions to plant quarantine regulations. Official communication **must** come from the plant protection organizations of foreign countries.

4. Make the commodity available for inspection, sampling, testing, etc. Shipments **cannot** be inspected on board aircraft or ships. Additionally, commodities which are loaded into maritime containers in bulk form can not be inspected once the container has been loaded. It is the exporter's responsibility to ensure that they make arrangements to have the consignment sampled and/or inspected prior to loading containers.

Ensure the commodity is accessible to the ACO s to verify, sample and inspect the consignment. In addition, other shipping documents should be marked or stamped to prevent the shipment from being loaded before the inspection is conducted.

5. Providing labor to open and close packages for inspection and for providing adequate facilities to perform the inspection. Such facilities include supplies, equipment, and proper lighting required for an efficient inspection before certification.
6. Provide for any required treatments, reconditioning, or other actions to meet the import requirements of the foreign country.

7. Export **only** those plants or plant products that have been properly inspected and certified under a Federal plant export certificate.
8. Safeguard the certified shipment from infestation between the date the shipment was sampled and the actual shipping date, and ensure that the certified shipment departs within the time limits specified by the importing country.
9. Comply with U.S. export control regulations. The Federal government controls the exportation of U.S. goods to all foreign countries. The Department of Commerce is the authority for licensing most items for export. Other Federal agencies such as the Agricultural Marketing Service and the Federal Grain Inspection Service handle the certification for specific products.

For further information, exporters may contact the Office of Export Control, Bureau of International Commerce, Department of Commerce at the following web site address:

<<http://www.trade.gov/td/tic/>>

Contact Protocol

When personnel involved in the export program require assistance it is important that they receive a prompt response from the appropriate person. In order to ensure that issues are resolved in a timely fashion it is important that the person requesting assistance:

- ◆ gather all the pertinent information, **and**
- ◆ refer it to the proper person for assistance.

For questions, concerns, and suggestions relating to the Export Program, follow the contact protocol in [Table 2-1-1 on page 2-1-13](#).

Additional guidance for obtaining assistance is provided below. To contact:

State and County

- ◆ Look up local listings for State agriculture officials
- ◆ In California contact your county agricultural office
- ◆ SPRO: <http://nationalplantboard.org/member/index.html>

ECS or SPHD

- ◆ EXCERPT: under *Export Certification Specialists*
- ◆ PPQ web page under Export Services



Each SPHD's office may have specific instructions on who the contact person is in their office. Follow the contact information provided by your SPHD's office.

Regional Program Managers (RPM)

- ◆ Eastern Region RPM: 919-855-7314
- ◆ Western Region RPM: 970-494-7500

Export Services (ES)

- ◆ General number: 301-734-8537
- ◆ EXCERPT: In the Messages and Alerts section there is a listing of ES staff, their area of responsibility, and their contact information

TABLE 2-1-1: Contacts for Assistance With Export Certification

If you are a:	Then your first contact is:	Then your second contact is:	Then your third ¹ contact is:	Then your fourth contact is:	Then your last contact is:
PPQ ACO	Supervisor	ECS	SPHD	RPM	ES
State or county ACO	Supervisor or SPRO	ECS	SPHD	RPM	ES
Exporter	State, county, or PPQ ACO	ECS	SPHD	RPM	ES

- 1 Each SPHD's office may have specific instructions on who the contact person is in that office. Follow the contact information provided by your SPHD's office.

Who Certificates Are Issued for and to

Certificates Are Issued for U.S. Exporters

Certificates can only be issued for exporters that have a physical address in the United States. A physical address means that someone must be physically working or living at that address. If the exporter lives in a foreign country they must provide an address of someone in the U.S. that is willing to be responsible for the consignment should APHIS need to conduct a traceback on the shipment.

Certificates Are Issued to the Importing Country

All certificates are issued to the National Plant Protection Organization (NPPO) of the importing country. Certificates are communication between the exporting country's NPPO to the importing country's NPPO. Therefore, the consignee's address and the block on the certificate titled "To: The Plant Protection Organization of" must be in the same country.

Types of Products and Associated Certificates

The type of product dictates which certificate can be used to certify that product. The following types of products are described for the purposes of export certification:

- ◆ **Unprocessed Domestic Products (PPQ 577)**
- ◆ **Processed Domestic or Foreign Products (PPQ 578)**
- ◆ **Unprocessed Foreign Products (PPQ 579)**

Unprocessed Domestic Products (PPQ 577)

Unprocessed domestic products are those plants or plant products grown or produced in the United States, its possessions, and Puerto Rico. PPQ Form 577, Federal Phytosanitary Certificate, is authorized to certify that domestic plants and plant products conform with the phytosanitary regulations of the importing country (see **PPQ Form 577, Federal Phytosanitary Certificate** on page 2-1-15).

Unprocessed Foreign Products (PPQ 579)

Unprocessed foreign products are those plants and plant products that have officially entered U.S. commerce but were grown or produced in countries **other than** the United States, its possessions, and Puerto Rico. Foreign origin, unprocessed products are eligible for PPQ Form 579, Phytosanitary Certificate for Reexport (see **PPQ Form 579, Phytosanitary Certificate for Reexport** on page 2-1-15.)

Processed Domestic or Foreign Products (PPQ 578)

Processed domestic or foreign origin products are those plant products processed or manufactured to the degree that they are unlikely to harbor injurious pests. PPQ Form 578, Export Certificate, Processed Plant Products, may be issued for **only** those processed products that are listed in EXCERPT as eligible for PPQ Form 578. The intended purpose of the PPQ Form 578 is to assist U.S. exporters whose shipments may be placed in jeopardy if such a document is **not** issued (see **PPQ Form 578, Export Certificate, Processed Plant Products** on page 2-1-15.)



Processed products are **not** eligible for certification with PPQ Form 577 or PPQ Form 579 even when the importing country specifically requires a phytosanitary certificate. ACOs **cannot** issue PPQ 578s for products that are listed in EXCERPT as **ineligible** or are not listed in the Processed Products Menu in EXCERPT.

Types of Certificates

PPQ Form 577, Federal Phytosanitary Certificate

PPQ Form 577, Federal Phytosanitary Certificate, is an accountable phytosanitary certificate used to certify domestic plants and unprocessed or unmanufactured products for export. The purpose of PPQ Form 577 is to certify that plants or plant products conform with the current phytosanitary regulations of the importing country.

Refer to [PPQ Form 577, Federal Phytosanitary Certificate](#) on page 5-2-1 for additional information.

PPQ Form 578, Export Certificate, Processed Plant Products

PPQ Form 578, Export Certificate, Processed Plant Products, is an accountable certificate used to certify specific processed plant products for export. PPQ Form 578 was created by PPQ to fill a void where **no** other USDA agency certification existed or could be adapted. **No** liability is assumed by the USDA or by any of its representatives with respect to this certificate. The purpose of PPQ Form 578 is to assist U.S. exporters whose shipments may be placed in jeopardy if such a document is **not** issued.

Refer to [PPQ Form 578, Export Certificate, Processed Plant Products](#) on page 5-3-1 for additional information.



Issue PPQ Form 578 **only** for processed products specified in EXCERPT as eligible, regardless of the product's origin. A few processed products are eligible for a PPQ 577. These exceptions are listed in EXCERPT in the Processed Products Menu.

PPQ Form 579, Phytosanitary Certificate for Reexport

PPQ Form 579, Phytosanitary Certificate for Reexport, is an accountable phytosanitary certificate used to certify foreign origin plants and unprocessed or unmanufactured plant products that have been imported into the United States. The purpose of PPQ Form 579 is to certify that plants or plant products conform with the current phytosanitary regulations of the importing country. The PPQ 579 **can not** be issued for processed products of foreign origin.

Refer to [PPQ Form 579, Phytosanitary Certificate for Reexport](#) on page 5-4-1 for additional information.

Official Samples and Inspections

It is APHIS-PPQ policy that the issuance of a PPQ 577 must **always** be based on an official sample and official inspection. Adhering to this policy further ensures shipment integrity and program credibility.

The necessity to conduct official sampling and inspections of commodities being certified with a either a PPQ 578 or PPQ 579 will depend on a number of factors. For detailed information on the sampling and inspection requirements for the issuance of a:

- ◆ PPQ 578 refer to ***Basis of Certification*** on page 5-3-4
- ◆ PPQ 579 refer to ***PPQ Form 579, Phytosanitary Certificate for Reexport*** on page 5-4-1

Only persons authorized by USDA-APHIS-PPQ can draw samples and conduct inspections of commodities for which a PPQ 577 and PPQ 579 (when an inspection is required) may be issued. Under no circumstances can an exporter provide their own sample for inspectional purposes.

Official sampling and inspecting may be conducted by:

- ◆ Federal, State, or County plant regulatory officials for plants and plant products
- ◆ Cooperating agencies such as Federal Grain Inspection Service (FGIS) for grain and grain products (see ***Federal Grain Inspection Service (FGIS)*** on page 6-6-1) or Agricultural Marketing Service (AMS) for specific commodities
- ◆ Non-government entities accredited for seed sampling (see list in ***Seed Health Accreditation Program*** on page 6-2-3)

The sampling and inspection of commodities for the issuance of a PPQ 578 do not have to be official samples; they may be submitted by the exporter.

Official sampling and inspections are required even if a commodity is subject to a mandatory treatment. Regardless of the type of treatment the commodity was subjected to, the treatment may not have been efficacious against all the regulated pests that may be present in a shipment.

For example:

- ◆ Seeds treated with a fungicide: Fungicides may not kill insects, snails, etc., and will have no effect on the presence of weed seed contaminates.

- ◆ Methyl Bromide treatments: some methyl bromide treatments only affect specific pests. If you do not inspect the commodity you will not know that all regulated pests associated with the shipment were killed. Methyl bromide treatment has no effect on soil and weed seed contamination.



Official sampling and inspections are required even if a commodity is subject to a mandatory treatment.

Inspections should be done prior to any treatment. Should pests be detected, use the Treatment Manual to verify the required treatment that is efficacious against the pests of concern. After the appropriate treatment there should be no need to reinspect. If there was no opportunity to inspect prior to treatment, it would be necessary to inspect to meet the inspection requirement.

Official Verification and Additional Declaration

An important requirement that must be met prior to a phytosanitary certificate (PC) being issued is that the ACO signing the PC officially verify that all the phytosanitary requirements of the importing country have been met.

Official verification (OV) means that the phytosanitary condition of the consignment was confirmed by an official of the National Plant Protection Organization (NPPO) of the U.S. OVs **must not** be stated on a PC unless the importing country specifically states that an additional declaration is required. Treatment requirements are an exception; if a treatment is mandatory it must be included in the treatment section of the certificate.



Phytosanitary treatments required by an importing country must be included on the phytosanitary certificate.

Treatments are never included on a PPQ 578.

The definition of an additional declaration (AD) is “A statement that is required by an importing country to be entered on a phytosanitary certificate and which provides specific additional information on a consignment in relation to regulated pests.” [FAO, 1990; revised ICPM, 2005]. Basically, an AD is an official verification (OV) that is written on the phytosanitary certificate (PC).

OVs, whether they require an AD or not:

- ◆ Must be allowed by APHIS policy. If a required OV is prohibited by APHIS policy certification cannot be provided,

An example of an OV that is prohibited: “Seed must be heat treated so that seed is not viable.” This OV cannot be provided because ACOs cannot verify the heat treatment of seeds.

- ◆ Must be verified by an ACO and supported by documentation.

To supplement the above instructions to complete the *Additional Declaration* section of a PPQ 577 and PPQ 579 see the following:

- ◆ [Authority for Entering Additional Declarations](#)
- ◆ [Acceptable Additional Declarations](#)
- ◆ [Exceptions to Acceptable Additional Declarations: For Grain](#)
- ◆ [Prohibited Additional Declarations](#)

Authority for Entering Additional Declarations

ONLY ACOs have the authority to enter ADs on phytosanitary certificates. It is not permissible to put ADs on PPQ Form 578, Export Certificate, Processed Plant Products.

Exporters, shippers, or brokers are **not** allowed to enter ADs on certificates, **except** when the ACO’s workload **does not** allow him or her to prepare the certificate. In these rare cases, the ACO **must** dictate the required AD to the exporter and check the wording for accuracy.

Acceptable Additional Declarations

ADs can only be included on phytosanitary certificates (PPQ 577 or PPQ 579) when required by the importing country or APHIS policy. ADs may be entered on a phytosanitary certificate in the following instances, except when prohibited by APHIS policy:

- ◆ Export summary specifically states an AD is required
- ◆ Import permits (IP), import licenses, letters of authorization, or other forms of official communication from the National Plant Protection Organization (NPPO) of the foreign country and presented by the exporter specifically state that an AD is required
- ◆ Importer is a government agency that has a commercial contract with the exporter. In this instance, ACOs are to add an AD referring to the contract.
- ◆ ADs specific to the issuance of a PPQ 579 (see [Additional Declarations Specific to PPQ 579](#) on page 5-4-6).
- ◆ AD referring to the IP, import license, etc. For example, “Import Permit (insert number) was presented.”

The following are included as acceptable ADs because they imply that they are required by a foreign country (they are examples of when information exists that ACOs believe the National Plant Protection Organization of the importing country should know):

- ◆ Attach an official document to the PC because the document has a direct bearing on the description of the plants or plant products and is of a phytosanitary nature (in this instance, ACOs are to add an AD referring to the attachment; see [Attachment Sheets and Continuation Sheets for Export Certificates](#) on page 5-1-7)
- ◆ Insufficient space in blocks on the PC to describe the consignment or enter ADs (see [Attachment Sheets and Continuation Sheets for Export Certificates](#) on page 5-1-7)
- ◆ When a PC is replaced (see [“Replacing” Lost Certificates](#) on page 5-1-10)
- ◆ When a PC is superseded (see [“Superseding” Certificates](#) on page 5-1-11)
- ◆ Required or mandatory import permit **was** presented by the exporter (see example below)
- ◆ Required import permit **was not** presented (see example below)

EXAMPLE

“Import Permit Number 37620 was presented.”

“**No** Import Permit was presented.”

**Amending an
Additional
Declaration**

When allowed by the importing country, ACOs can amend an AD when the pest of concern is not known to occur in the United States.

EXAMPLE

Country requires the following additional declaration: “Plants must originate from an area free of Coconut cadang-cadang viroid.”

Since Coconut cadang-cadang viroid is not known to occur in the United States, the additional declaration can be changed to: “Coconut cadang-cadang viroid is not known to occur in the United States.”

Exceptions to Acceptable Additional Declarations: For Grain

When ACOs are certifying shipments of grain and a particular pathogen occurs in the United States ACOs **must never** attest to freedom or apparent freedom from plant disease causing organisms such as fungi, nematodes, etc. USDA-APHIS-PPQ’s policy prohibits making such statements as ADs, because inspecting parent plants during active growth in the field or analyzing selected grain samples in the laboratory is impractical. Laboratory testing cannot be used as a basis for certification because a methodology for representative sampling and testing for disease in grain has never been developed.

This prohibition applies regardless of whether the requirement is stated in an export summary, an import permit, or letter of contract.

An exception to this policy is when the pathogen is NOT known to occur in the United States. In such cases, write the AD using the following form: “[Enter the name of the pathogen that is not known to occur in the U.S.A.] is not known to occur in the United States.”

EXAMPLE

“*Cephalosporium maydis* and *Peronosclerospora maydis* are **not** known to occur in the United States.”

For grain, ACOs may attest to an AD against Karnal bunt of wheat (*Tilletia indica*), when that AD is specifically listed in EXCERPT. This exception exists because of an ongoing national survey against Karnal bunt of wheat. For any other request to list an AD against Karnal bunt of wheat in grain, contact Export Services through channels. See [Table 2-1-1 on page 2-1-13](#).

Prohibited Additional Declarations

ACOs **must never** enter or authenticate an AD on a certificate that refers to the following:

- ◆ Advice number
- ◆ Aflatoxins or other mycotoxins
- ◆ Authorization number (**not** to be confused with a letter of authorization from the plant protection organization of the importing country)
- ◆ Fitness for human consumption
- ◆ For bulk shipments of grain, freedom from plant disease-causing organisms, when a pathogen occurs in the United States
- ◆ Freedom from animal diseases and statements about animal health concerns⁴
- ◆ Grade and/or quality
- ◆ Genetic composition and/or disease resistance⁵
- ◆ Intended use (such as for scientific purposes)
- ◆ Import reference number
- ◆ Import tariff item number

4 APHIS’ policy is to **not** attest to animal health concerns on certificates. Refer exporters to USDA-APHIS-PPQ Veterinary Regulatory Services for letterhead statements to attest to the freedom from specific animal diseases. **Do not** attach these statements to certificates.

5 For certifying genetic composition and/or disease resistance, refer exporters to GIPSA at 202-720-0252 or <<http://www.aphis.usda.gov/biotech>> for letterhead statements. **Do not** attach these statements to certificates.

- ◆ Letter of commitment number
- ◆ Letter of credit number
- ◆ Letter of credit requirements or other unofficial requests from buyers and sellers
- ◆ Levels of radioactivity, nuclear radiation, or radionuclides associated with a commodity⁶
- ◆ Official verification listed in an export summary or an import permit
- ◆ Pesticide or other chemical residues
- ◆ Purchase contract number
- ◆ References pertaining to a permit or a permit number issued by the Division of Management Authority for protected plant species
- ◆ References to artificially propagated or wild collected plants
- ◆ Any other requested statement that is **not** of a phytosanitary nature, such as economic permits, quantity or quality

Time Limits

“Time limits” refers to restrictions on the time period that is allowed between inspections, issuance of certificates and exportation. In addition to APHIS’s policy on time limits, each importing country may specify their own time limit requirements.

In order to ensure that time limits are met it is important to understand the difference between each type of date.

- ◆ Date of issuance: date that a certificate is signed.
- ◆ Date of inspection: date that an ACO or other authorized entity conducts the phytosanitary inspection.
- ◆ Date of exportation: date the commodity is exported from the United States. This date should be specified on a bill of lading for the commodity.

While the date of issuance and inspection can be the same they are two different actions.

⁶ For attesting to the absence of abnormal radioactive contaminant levels, refer exporters to Office of Food Safety and Technical Service, USDA/FAS OFSTS, Room 5545, South Agricultural Building, 14th and Independence Avenue, SW, Washington, DC 20250; phone 202-720-1301.

APHIS' policy on time limits is that a consignment must be exported within 30 days of the phytosanitary inspection; the maximum time limit between the inspection date and the shipping date is 30 calendar days. This time limit must be met unless the importing country's time limit, between inspection and exportation, exceeds APHIS' policy on time limits. APHIS policy must be met even if a country's time limits refers to the time period between issuance of a certificate and exportation.

Importing countries' time limits, if specified, will be included in the country's definition of a phytosanitary certificate, phytosanitary certificate for re-export and the processed product certificate in EXCERPT under Definitions of Terms and Coded Abbreviations. Additionally, time limits may be specified for an individual commodity or class of commodities, elsewhere in an export summary. Failure to review an individual country's time limits may result in the improper certification of a consignment.

Example 1: Country has no time limits: Exporter applies for service on December 26th and states that consignment will be exported on January 30th. Because the country does not specify any time limits apply APHIS' policy on time limits.

- ◆ The phytosanitary inspection must meet APHIS' 30 day policy, therefore, the phytosanitary inspection must take place between January 1 and January 30.
- ◆ Inform exporter that consignment must be exported within 30 days of the inspection. If the shipment is not or will not be exported by January 30 do not issue a certificate. A new inspection will have to be conducted or the exporter will have to change their shipping date to meet the 30 day time limit.

Example 2: Country has no time limits: Exporter applies for service on December 26th and states that consignment will be exported on January 30th. Because the country does not specify any time limits apply APHIS' policy on time limits.

- ◆ The phytosanitary inspection was conducted on December 28th. Exporter was informed that consignment must be exported within 30 days of the inspection.
- ◆ Exporter requests the issuance of the certificate on February 10th and states that consignment will be exported on February 15th.
- ◆ Since the consignment was not exported within 30 days of inspection the inspection conducted on December 28th is now invalid. Inform exporter that the consignment must be reinspected in order to issue a certificate.

Example 3: Country has no time limits: Exporter applies for service on January 1st and states that consignment will be exported on January 30th. Because the country does not specify any time limits apply APHIS' policy on time limits.

- ◆ The phytosanitary inspection was conducted on January 2nd and exporter was informed that consignment must be exported within 30 days of the inspection.
- ◆ Exporter requests the issuance of the certificate on February 10th and states that consignment was exported on February 1st.
- ◆ Since the consignment was not exported within 30 days of inspection the inspection conducted on January 2nd is now invalid. Inform exporter that the consignment was not exported within the time limit and a certificate can not be issued. Refuse to issue a certificate and contact Export Services.

Example 4: Country's time limit: The maximum time limit between the date of issuance of a phytosanitary certificate and exportation is 14 days.

- ◆ Exporter applies for service and states that consignment will be exported on October 14.
- ◆ Phytosanitary inspection must occur within 30 days prior to October 14 in order to comply with APHIS' policy on time limits.
- ◆ Do not issue the certificate before October 1st. Inform exporter that consignment must be exported within 14 days of issuance of the certificate or they must request a new certificate.
- ◆ If exporter does not request the issuance of the certificate within 14 days prior to exportation and the consignment has been exported, refuse to issue the certificate and contact Export Services.

Example 5: Country's time limit: The maximum time limit between the date of issuance of a phytosanitary certificate and exportation is 14 days.

- ◆ Shipment was inspected on 8/17/05.
- ◆ Certificate was issued on 9/9/05.
- ◆ Shipment was exported on 10/1/05.
- ◆ Exporter requests that certificate be reissued on November 15th.

Based on the country's time limits the shipment must have been exported by September 22. In this case the shipment was not exported within the country's time limits and a new certificate is required. Before issuing another certificate you need to ensure that APHIS' policy on time limits is met.

More than 30 days elapsed between the time the shipment was inspected and exported. Therefore, APHIS' policy on time limits was exceeded and the inspection is no longer valid. In order to reissue or supersede the original certificate another inspection would need to be conducted. In this case, because the consignment was already exported a new certificate cannot be issued.

Laboratory Analyses for Seeds for Propagation

If a country requires a laboratory test **and** the pests (any class of quarantine pest) of concern do not attack/can not attack the commodity post-harvest the laboratory test does not have to be conducted within the time limits specified either by the country or APHIS' general policy on time limits. This is similar to field tests that do not have to meet time limits.

ACOs need to ensure that the pests of concern can not infest or infect the commodity post-harvest. ACOs should confer with an entomologist, pathologist, nematologist, etc. to make this determination. If a PC is issued based on a laboratory test conducted outside of specified time limits, documentation supporting the decision must be kept with the file copy of the PC.

Additionally:

1. The seed lot must remain intact, meaning that there are no additions to the total weight of the lot and the seed has remained unadulterated after testing has taken place.
2. The lot number cannot change after testing has taken place.

EXAMPLE

Assuming the pest of concern can not infect the commodity post-harvest and the country's time limits are that there can be no more than 21 calendar days between the inspection date and the shipping date: if a laboratory test was done on January 14, 2004, there is no need to repeat the test for a shipment exported on June 30, 2005.

The above policy does not:

- ◆ supersede specific instructions in an export summary in EXCERPT, work plans or other official communication with respect to laboratory tests and time limits
- ◆ change the policy with respect to inspection and time limits; inspections must be conducted within specified time limits.



This exception to the policy on time limits does not apply to situations in which the pest can attack/infest the commodity post-harvest, but, the seeds were safeguarded. When the pests of concern can attack/infest the commodity post-harvest ACOs **cannot**, nor are they authorized to certify seeds based on the fact that the seeds were safeguarded after testing. ACOs can not verify that the pests of concern did not infest/infect the commodity after the initial test. Each time a phytosanitary certificate is issued, under these circumstances, the time limits for the laboratory test must be met.

Treatments

All treatments required as the basis for issuing a phytosanitary certificate (PC) **must**:

- ◆ Be conducted following the procedures in the APHIS, PPQ, Treatment Manual. This is true if the treatment is supervised by PPQ, a State or County official.
- ◆ Be monitored or supervised by a Federal, State, or county plant quarantine official.
- ◆ Treatments conducted by the Federal Grain Inspection Service (FGIS) for grain and grain products and indicated on an acceptable FGIS certificate can be included on a phytosanitary certificate. See **Step 2: Determine if the Exporter Has an Acceptable Inspection Certificate That Would Preclude an Additional Inspection** on page 4-5-4 and refer to **7. Does the Commodity Require Treatment or Was a Treatment Conducted?** on page 4-4-11.



Phytosanitary treatments can be conducted by the Federal Grain Inspection Service (FGIS). The treatment can be included on a phytosanitary certificate as long as the treatment is indicated on an acceptable FGIS certificate. See **Step 2: Determine if the Exporter Has an Acceptable Inspection Certificate That Would Preclude an Additional Inspection** on page 4-5-4.

Treatments are not allowed to be included on PPQ 578.

Steps to Certifying a Commodity

The basic steps are as follows:

Step 1—Determine if Commodity is Eligible for Certification

Before referring to a country's export summary, inspecting a shipment, or completing a certificate, ACOs **must** determine whether the commodity is eligible for any type of certificate. Their assessment is based on what the product is, the product's origin and destination, and the ACO's authority to certify protected plants. (See *Steps to Certify*, **Determine Eligibility for Certification** on page 4-2-1.)

Step 2—Identify Import Requirements

ACOs must determine the importing country's phytosanitary requirements before conducting an inspection or issuing a certificate. The import requirements of a country may be provided by either the EXCERPT database or official communication from the National Plant Protection Organization of the importing country. These instruments may also identify prohibitions that would **prohibit** them from certifying commodities.

Based on whether the commodity can meet the import requirements, ACOs then determine whether they can issue a certificate. (See [Take Action on Common Import Requirements](#) on page 4-4-1.)

Step 3—Follow Inspection Guidelines

Once the import requirements have been identified, the commodity must be inspected and/or other conditions of importation must be verified. (See [Follow Inspection Guidelines](#) on page 4-5-1.)

Step 4—Prepare Export Certificates

ACOs prepare the appropriate certificate, as listed and described below (see [Issuing Certificates](#) on page 5-1-1).

- ◆ [PPQ Form 577, Federal Phytosanitary Certificate](#)
- ◆ [PPQ Form 578, Export Certificate, Processed Plant Products](#)
- ◆ [PPQ Form 579, Phytosanitary Certificate for Reexport](#)

Step 5—Collect User Fee

USDA-APHIS-PPQ has established user fees exporters must pay in order to receive certificates. These user fees only apply when the certificate is issued by a Federal ACO. User fees are collected for the following:

- ◆ [PPQ Form 577, Federal Phytosanitary Certificate](#)
- ◆ [PPQ Form 578, Export Certificate, Processed Plant Products](#)
- ◆ [PPQ Form 579, Phytosanitary Certificate for Reexport](#)

Refer to [User Fees](#) on page 6-15-1 for further information.

Overview of Special Procedures

There are aspects of export certification that have established special procedures and unique programs that provide guidance which supplement the general guidelines. A list of special procedures follows. See [Special Procedures](#) on **page 6-1-1** for further information.

- ◆ [Accreditation Programs](#)
- ◆ [Compliance Agreements for Compressed, Baled Cotton](#)
- ◆ [Containerized Oak Lumber](#)
- ◆ [Federal-State Cooperative Program](#)
- ◆ [Mail Exports](#)
- ◆ [Federal Grain Inspection Service \(FGIS\)](#)
- ◆ [Mill Certification Programs for Coniferous Sawn Wood](#)
- ◆ [Plants in Growing Media for Export to European Union](#)
- ◆ [Processing Protected Plants](#)
- ◆ [Protocol for Requesting Review of Certification Eligibility](#)
- ◆ [Review Guidelines for Certificates](#)
- ◆ [Sampling and Inspection Procedures for Seed](#)
- ◆ [United States-Canada Greenhouse Certification Program](#)
- ◆ [U.S. Export Standards for Seed Potatoes](#)
- ◆ [User Fees](#)

Accreditation Programs

USDA-APHIS-PPQ has initiated accreditation programs that facilitate the exportation of commodities to foreign markets. Accreditation recognizes consistent levels of competency and confers specific authority. Accrediting trained personnel, organizations, facilities, and processes associated with phytosanitary functions enhances USDA-APHIS-PPQ's ability to protect plant resources and facilitate safe trade. Two accreditation programs initiated by USDA-APHIS-PPQ are the Accreditation of Authorized Certification Officials and the Seed Health Accreditation Program. See *Special Procedures*, [Accreditation Programs](#) on **page 6-2-1**.

Compliance Agreements for Compressed, Baled Cotton

PPQ Form 519, Compliance Agreement, is a written record of understanding made among certain industries and USDA to assist in the certification of plants and plant products offered for export. Compliance agreements may be appropriate for establishing procedures to certify compressed, baled cotton. Contact Export Services for approval prior to developing compliance agreements. See *Special Procedures*, **Compliance Agreements for Compressed, Baled Cotton** on page 6-3-1.

Federal-State Cooperative Program

The Federal and State Departments of Agriculture participate in cooperative agreements to more effectively perform phytosanitary export certification. The USDA-APHIS-PPQ phytosanitary export certification program is expanded to enable designated State cooperators to issue certificates at interior points of origin in the United States. Each State plant regulatory agency **must** negotiate a Memorandum of Understanding with USDA-APHIS-PPQ in order to be granted the authority to issue certificates. See *Special Procedures*, **Federal-State Cooperative Program** on page 6-5-1.

Containerized Oak Lumber

The special procedures for **Containerized Oak Lumber** on page 6-4-1 provide standardized inspection procedures for certifying containerized oak lumber. The preferred method of certifying lumber for export is to inspect the lumber before containerization. The fact that the lumber is tightly and neatly packed in containers **does not** negate the inspection function.

Mail Exports

The special procedures for **Mail Exports** on page 6-7-1 provide the necessary steps for processing plant material that is being exported by mail. When the plant material arrives at a mail facility at the point of export, the ACO can issue a certificate if the mail shipment is found free of plant pests and otherwise meets the import requirements of the foreign country.

Federal Grain Inspection Service (FGIS)

See **Federal Grain Inspection Service (FGIS)** on page 6-6-1. The **Phytosanitary Inspection of Export Grain Shipped from Interior Locations** on page 6-6-4 is based on an agreement between APHIS-PPQ and the Federal Grain Inspection Service (FGIS). This protocol is outlined in the FGIS Directive 9180.34. Both the FGIS Directive and this APHIS protocol address official sampling and inspection of grain shipments at remote facilities. This protocol does not apply to grain loaded at export port locations.

Mill Certification Programs for Coniferous Sawn Wood

USDA-APHIS-PPQ has initiated Memorandums of Understanding with lumber grading agencies to facilitate exports of coniferous sawn wood, an important export from the United States that is highly regulated because of various pests, including the pine wood nematode, *Bursaphelenchus xylophilus*. See *Special Procedures*, [**Mill Certification Programs for Coniferous Sawn Wood**](#) on page 6-8-1.

Plants in Growing Media for Export to European Union

APHIS' position is that if plants in growing media have sound nursery production procedures, then phytosanitary certification of these plants will provide European Union countries with protection against noxious organisms within the confines of the certifying statement on certificates and will adequately satisfy our obligation to international plant protection. Therefore, see *Special Procedures*, [**Plants in Growing Media and Containers to European Union**](#) on page 6-9-1 for the procedures established to certify shipments of plants offered for export to the European Union to ensure that the plants were grown following specific procedures for production and sanitation.

Processing Protected Plants

The special procedures for [**Processing Protected Plants**](#) on page 6-10-1 provide the necessary steps for processing eligible protected plants or protected plants or plant products moving in violation of CITES or ESA. When applicable, follow these procedures after completing a preliminary assessment beginning at [**Determine Eligibility for Certification**](#) on page 4-2-1.

Protocol for Requesting Review of Certification Eligibility

If a country requires a certificate but the commodity is not eligible exporters may request that APHIS-PPQ review the eligibility of their commodity for certification. The Protocol for Requesting Review of Certification Eligibility provides the procedure to follow when an exporter makes this request. See [**Protocol for Requesting Review of Certification Eligibility**](#) on page 6-11-1.

Review Guidelines for Certificates

See [**Review Guidelines for Certificates**](#) on page 6-12-1.

Sampling and Inspection Procedures for Seed

See [**Sampling and Inspection Procedures for Seed**](#) on page 6-13-1.

United States-Canada Greenhouse Certification Program

USDA-APHIS-PPQ and the Canadian Food and Inspection Agency have entered into a Memorandum of Understanding to provide for a modified phytosanitary certification program for the expeditious commercial movement of certain low-risk decorative plants between the two countries. See *Special Procedures*, **United States-Canada Greenhouse Certification Program** on page 6-14-1.

U.S. Export Standards for Seed Potatoes

Special procedures have been established for the certification of seed potatoes for export by official State seed potato certification agencies. See *Special Procedures*, **U.S. Export Standards for Seed Potatoes** on page 6-16-1.

User Fees

Special procedures have been written that cover the directions for collecting user fees for certificates and for issuing prepaid certificates. See *Special Procedures*, **User Fees** on page 6-15-1.